



THE CITY OF NEW YORK
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November 28, 2007

VIA FAX

Honorable Michael H. Dolinger
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Zhao v. The City of New York et al., 07 CV 3636 (LAK) (MHD)

Your Honor:

In compliance with the Court's Order dated November 21, 2007, defendants will produce to plaintiff the documents bearing bates stamp nos. In Cam 2-11, 21-36, 122-129, and 132-134, which were previously submitted to the Court for in camera inspection. However, we seek the Court's permission to produce the documents subject to certain redactions. In particular, defendants seek permission to redact two references on the document bearing bates stamp no. In Cam 127. The referenced document and the proposed redaction is attached hereto and marked "Confidential" for the Court's convenience. However, In Cam 127 is provided in redacted form to plaintiff's counsel for purposes of preserving assertions of privilege pending the Court's ruling on this application. The objectionable term is related to integrity checks conducted by the NYPD in response to certain allegations of police misconduct. Disclosure of this information will reveal law enforcement techniques and will compromise the ability of the NYPD to monitor claims of police misconduct. The limited redactions proposed by defendants balances the needs of the NYPD against the need of plaintiff to obtain discovery.

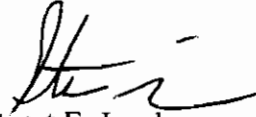
In light of the sensitive and confidential nature of these documents, defendants request an Order of the Court directing plaintiff's counsel to keep as confidential and for "attorney's-eyes-only" the documents bearing bates stamp nos. In cam 2-11, 21-36, 122-129, and 132-134.

ENDORSED ORDER

In view of the representation of defendants' counsel
in an ex parte phone call to chambers that defendants
will not redact the cited documents, this application
is denied as moot.
12/3/07

Thank you for your consideration of this matter.

Respectfully submitted,



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Assistant Corporation Counsel
Special Federal Litigation Division

Enclosure - Confidential

cc: **VIA FAX with redacted attachment**
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